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8 UNITED STATES DISTRICT COURT

9 NORTHERN DISTRICT OF CALIFORNIA

10 [Select one location: San Francisco / Oakland / San Jose / Eureka]

11 Francis Drouillard et al.

12 **CV 24-06969**  
Case Number: \_\_\_\_\_

13 \_\_\_\_\_  
14 Plaintiff(s),

Title of Document:

15 vs.

16 Lynda Roberts and  
17 Shirley Weber Ph.D.  
18 \_\_\_\_\_  
19 \_\_\_\_\_  
20 \_\_\_\_\_

COMPLAINT FOR DECLARATORY  
AND INJUNCTIVE RELIEF

21 Defendant(s).  
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23 SEE ATTACHED  
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TITLE OF DOCUMENT: \_\_\_\_\_ CASE NO.: \_\_\_\_\_

PAGE NO. \_\_\_\_ OF \_\_\_\_ [JDC TEMPLATE]

FILED  
OCT 04 2024

CLERK, U.S. DISTRICT COURT  
NORTH DISTRICT OF CALIFORNIA

AGT

**IN THE UNITED STATES DISTRICT COURT**

**IN AND FOR THE NORTHERN DISTRICT CALIFORNIA**

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FRANCIS DROUILLARD, MARK GALPERIN,  
JOHN TURNACLIFF, CHRIS CARPINIELLO,  
WALTER JENSEN, MATTHEW BENNETT  
AND MIA CAMERA

Plaintiffs,

vs.

LYNDA ROBERTS IN HER OFFICIAL  
CAPACITY AS MARIN COUNTY  
REGISTRAR OF VOTERS AND SHIRLEY  
WEBER, PH.D., IN HER OFFICIAL  
CAPACITY AS CALIFORNIA SECRETARY  
OF STATE,

Defendants

Case No.:

**COMPLAINT FOR DECLARATORY  
AND INJUNCTIVE RELIEF**

- I. Violation of the Fourteenth Amendment – Equal Protection
- II. Violation Of The National Voter Registration Act – Failure to Maintain Voter Rolls
- III. Violation Of The Help America Vote Act – Excessive Ballot Errors

**I. INTRODUCTION**

1. This action seeks declaratory and injunctive relief to prevent Defendants Lynda Roberts, in her official capacity as Marin County Registrar of Voters, and Shirley Weber, Ph.D., in her official capacity as California Secretary of State, from violating Plaintiffs' voting rights under the Fourteenth Amendment, the National Voter Registration Act (NVRA) [52 U.S.C. §§ 20507-20511], and the Help America Vote Act (HAVA) [52 U.S.C. §§ 20901-21145].

2. Plaintiffs allege that the actions of Defendants, including the failure to remove ineligible voters from registration rolls, allow illegal votes that dilute the votes of eligible voters, infringing Plaintiffs' rights to participate in a fair election.

**II. VENUE AND JURISDICTION**

3. This Court has subject matter jurisdiction under 28 U.S.C. § 1331 as the claims arise under federal statutes including NVRA [52 U.S.C. § 20507(b)] and HAVA [52 U.S.C. § 21081(a)(5)].





17. Defendants' failure to implement these programs in Marin County has allowed thousands of ineligible voters to remain on the voter rolls, contravening the NVRA's explicit requirements to safeguard the integrity of the electoral process.

**Third Cause of Action: Violation of the Help America Vote Act (HAVA)**

18. Plaintiffs reallege and incorporate by reference each preceding paragraph as though fully set forth herein.

19. HAVA establishes error rate limits for voting systems and requires each state to maintain accurate voter rolls by regularly removing ineligible voters (52 U.S.C. § 21081(a)(5)).

20. The excessive number of ballot errors generated by votes cast by ineligible voters in Marin County exceeds the error rate permitted under HAVA, rendering recent elections unreliable and violative of federal election law.

**VI. PRAYER FOR RELIEF**

WHEREFORE, Plaintiffs respectfully request that this Court enter judgment against Defendants and grant the following relief:

1. Declaratory Relief: A declaration that Defendants' failure to maintain accurate voter rolls violates the Equal Protection Clause, NVRA, and HAVA.
2. Injunctive Relief: An injunction requiring Defendants to take immediate steps to:
  - o Remove ineligible voters from Marin County's voter rolls;
  - o Implement a verification system to ensure only eligible voters are mailed ballots in future elections; and
  - o Comply with NVRA and HAVA requirements to maintain accurate and current voter registration rolls.

1 3. Order for Compliance: Require the Marin County Registrar to sequester ballots cast  
2 by voters identified as ineligible to prevent them from being counted in future elections.

3 4. Attorney's Fees and Costs: Award reasonable attorneys' fees and costs pursuant to  
4 applicable law.

5 5. Further Relief: Grant any such further relief as the Court deems just and proper.

6 DATED: October 7, 2024,

Respectfully Submitted,

7 

8 FRANCIS DROUILLARD (Pro Se)

9 I, Francis Drouillard, attest, under penalty of  
10 perjury, that the six Signatories below have  
concurred in the filing of this complaint.

11  
12 /s/

MARK GALPERIN (Pro Se)

13  
14 /s/

JOHN TURNACLIFF (Pro Se)

15  
16 /s/

CHRIS CARPINIELLO (Pro Se)

17  
18 /s/

WALTER JENSEN (Pro Se)

19  
20 /s/

MATTHEW BENNETT (Pro Se)

21  
22 /s/

23 MIA CAMERA (Pro Se)